

**Remarks**

The Office Action mailed February 18, 2004 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-24 are pending in this application. Claims 1-24 stand rejected.

The rejection of Claims 1-4, 12-15, and 23-24 under 35 U.S.C. § 103(a) as being unpatentable over Highbloom (U.S. Patent 5,323,315) in view of Hogan (U.S. Pat. App. Pub. No. 2001/0013545 A1) and Tarter et al. (U.S. Patent 5,550,734) ("Tarter") is respectfully traversed.

Applicants respectfully submit that none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest the claimed invention. As discussed below, at least one of the differences between the cited references and the present invention is that none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest receiving a financial report at a process management and workflow system from an accounting system of a customer via an electronic data interchange, converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report, and extracting current collateral information from the converted financial report.

Moreover, another difference between the cited references and the present invention is that none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest evaluating a current credit status of the customer including an analysis of at least one of the customer's business performance, dilution, and advance rate, and determining to at least one of approve a customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information.

Highbloom generally describes a system (10) for monitoring the status of individual items of personal property which serve as collateral for securing financing. System (10) includes a disc drive (26) associated with a processor (16) for allowing the transfer of data from a remote location to be entered into the processor by means of a floppy disk (28) or a magnetic tape. (col. 7, lines 3-6). System (10) receives financial information that includes information pertaining to a floor plan credit loan, a consumer loan being extended, or the receipt of money which is paid for the repayment of a particular loan. System (10) analyzes the financial information to track prompt repayment of a loan, to note any delinquent payments, and to determine if a particular item is simultaneously being financed by two financing sources. (col. 4, line 52 to col. 5, line 11).

Hogan describes a financial transaction card payment system, such as a credit card payment system having an installment loan feature. (Page 3, para. 34). Hogan also describes a statement that includes, among other things, the current installment payment amount due, being mailed to the cardholder. (Page 3, para. 38). After the payment is received from the customer, the system then determines whether the payment received is less than the installment loan amount due. If the payment received is less than the installment loan amount due, a cash advance in the amount of the difference between the payment received and the installment loan amount due is charged against the cardholder's credit line. (Page 4, para. 39). Notably, Hogan does not describe or suggest evaluating a cardholder's current collateral information and current credit status.

Tarter describes a Computerized Healthcare Accounts Receivable Management System (CHARMS) for financing health care service providers, especially pharmacies, by evaluating and purchasing service providers' accounts receivable, rating the creditworthiness of the relevant payors and obligors (e.g., insurance companies, self-insured employers, health maintenance organizations, preferred provider organizations, government agencies, and other entities sponsoring groups and individuals receiving health care benefits), collecting on the receivables, managing the funds, processing and reconciling claims and payments, and securitizing the receivables (col. 1, line 65 to col. 2, line 9). CHARMS also provides the means to obtain the funds needed to purchase the account receivables through securitization (i.e., borrowing the money and using the receivables as collateral). Specifically, CHARMS provides the means for the purchase by a System Operator of the accounts receivable from

the health care service provider, and then utilizes historical third party payment data and standardized ratings of the relevant payors and obligors to present rating agencies a conventional underwriting package that is easy to rate. Once a rating is obtained, various markets are used to obtain funding.

Claim 1 recites a method for processing cash advance requests using a process management and workflow system coupled to a data repository, the process management and workflow system connected to an accounting system by a communications link, wherein the method includes “generating a financial report using the accounting system wherein the financial report includes current collateral information for a customer, the current collateral information includes information relating to the customer’s accounts receivable, accounts payable, and inventory...receiving the financial report at the process management and workflow system from the accounting system of the customer via an electronic data interchange...converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report...extracting current collateral information from the converted financial report...storing the current collateral information in the data repository...receiving from the customer a cash advance request at the process management and workflow system...operating the process management and workflow system to record the cash advance request...evaluating the current, customer collateral information through the process management and workflow system...evaluating a current credit status of the customer through the process management and workflow system including an analysis of at least one of the customer’s business performance, dilution, and advance rate...determining, through the process management and workflow system, to at least one of approve the customer’s cash advance request, deny the customer’s cash advance request, and initiate a manual review of the customer collateral information.”

None of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a method for processing cash advance requests as recited in Claim 1. More

specifically, none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest receiving a financial report at a process management and workflow system from an accounting system of a customer via an electronic data interchange, and converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report such that the current collateral information can be extracted from the converted financial report.

Furthermore, none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a method for processing cash advance requests that includes evaluating a current credit status of the customer through the process management and workflow system including an analysis of at least one of the customer's business performance; dilution, and advance rate, and determining through the process management and workflow system to at least one of approve the customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information.

Rather, in contrast to the present invention, Highbloom describes a system for monitoring the status of individual items of personal property which serve as collateral for securing financing; Hogan describes a financial transaction card payment system, such as a credit card payment system having an installment loan feature; and Tarter describes a system that purchases accounts receivables from health care providers such as pharmacies and then uses the purchased accounts receivables as collateral for financial instruments.

Applicants respectfully traverse the suggestion included in the Office Action at page 4 that Highbloom describes "updating the collateral information of the customer by receiving via an electronic data interchange a financial report from a received document format to a predetermined document format by detecting a report type and then by performing a mapping and translation process, extracting at least one of accounts receivable data, accounts payable data, and quality control system and loading the extracted data into the data repository."

Applicants are directed to Highbloom col. 8, lines 1+. Applicants submit that col. 8, lines 1+ of Highbloom describes printing and scanning information contained in reports into a financing source computer, or inputting the information into the financing source computer via a keyboard or floppy disk. Highbloom does not describe or teach receiving a financial report at a process management and workflow system from an accounting system of a customer via an electronic data interchange, and converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report.

Accordingly, Applicants submit that none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest converting a financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report.

The Office Action further provides at page 6 that Highbloom “fails to disclose a method of processing and/or receiving a cash advance request”. Applicants submit that although Highbloom describes a computer system for monitoring the status of individual items of personal property which serve as collateral for securing financing, Highbloom does not describe or suggest a method for processing cash advance requests that includes receiving collateral information from a customer that includes information relating to the customer’s accounts receivable, accounts payable, and inventory. In fact, Highbloom does not even mention accounts receivable or accounts payable, but rather only describes monitoring personal property to be included in inventory. Because Highbloom does not describe or suggest collateral information that includes information relating to a customer’s accounts receivable, accounts payable, and inventory, Highbloom does not describe or suggest

determining through the process management and workflow system to at least one of approve the customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information.

Applicants also respectfully traverse the suggestion included in the Office Action at page 6 that Highbloom discloses at col. 4, line 52 to col. 5, line 11 evaluating a current credit status. Rather, Applicants respectfully submit that Highbloom discloses the following at col. 4, line 52 to col. 5, line 11:

The monitoring system 10 receives the financing information from the inventory financing sources 12 and the consumer financing sources 14 on a periodic basis. The financing information received includes information pertaining to a floor plan credit loan or a consumer loan being extended or the receipt of money which is paid for the repayment of a particular loan....

The monitoring system 10 automatically compares the financing information received from the inventory financing sources 12 and the consumer financing sources 14. The financing information is analyzed by the monitoring system to track the prompt repayment of a loan, to note any delinquent payments and to determine if a particular item is simultaneously being financed by two financing sources, such as by both an inventory financing source 12 and a consumer financing source 14 as will be discussed hereinafter. Included in the financing information for both the inventory financing sources 12 and the consumer financing sources 14 is a unique identification code which is associated with each item of personal property. In the case of a vehicle, the vehicle identification number (VIN) may be used.

In other words, Highbloom discloses a system that compares financing information (e.g., vehicle identification numbers) received from inventory financing sources and consumer financing sources to determine if a particular item is simultaneously being financed by two financing sources, such as by both an inventory financing source and a consumer financing source. Highbloom does not describe or suggest evaluating a credit status of a customer. More specifically, Highbloom does not describe or suggest evaluating a current credit status of a customer including an analysis of at least one of the customer's business performance, dilution, and advance rate

Moreover, although Hogan describes a system that charges a difference between a credit card payment received and a credit card installment loan amount due against a cardholders credit line as a cash advance, Hogan does not describe or suggest a method for

processing cash advance requests that includes receiving from a customer collateral information that includes information relating to the customer's accounts receivable, accounts payable, and inventory. In fact, the Office Action acknowledges at page 6 that Hogan fails to disclose "receiving collateral information which includes information relating to the customer's accounts receivable and accounts payable." Additionally, Hogan does not describe or suggest evaluating the current customer collateral information, evaluating a current credit status of the customer including an analysis of at least one of the customer's business performance, dilution, and advance rate, and determining through the process management and workflow system to at least one of approve the customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information.

Furthermore, although the Office Action suggests at page 6 that "Tarter discloses a system which provides a means to obtain needed funds by receivables securitization, (borrowing the money and using the receivables as collateral)", Applicants respectfully submit that Tarter does not describe or suggest a method for processing cash advance requests as recited in Claim 1. Rather, in contrast to the present invention, Tarter describes a method and system for purchasing an account receivable from a health care service provider that includes receiving the account receivable (i.e., an insurance claim) from the service provider, identifying a payor and an obligor associated with the account receivable, retrieving a creditworthiness status of the payor and obligor from a profile database record, determining whether to purchase the account receivable from the service provider based on the creditworthiness status, and if the determination is to purchase the account receivable, making a payment to the service provider for its purchase. In other words, Tarter teaches evaluating the creditworthiness of a payor and/or obligor associated with an account receivable that is payable to a service provider, and then determining whether to purchase the account receivable from the service provider. Tarter does not describe or teach a method for processing a cash advance request that includes generating a financial report using an accounting system wherein the financial report includes current collateral information for a customer including information relating to the customer's accounts receivable, accounts payable, and inventory, and receiving the financial report at the process management and workflow system from the accounting system of the customer via an electronic data interchange.

More specifically, Tarter describes purchasing an account receivable, and does not teach a method for processing a cash advance request that includes generating a financial report using an accounting system wherein the financial report includes current collateral information for a customer including information relating to the customer's accounts receivable, accounts payable, and inventory, and receiving the financial report at a process management and workflow system from the accounting system of the customer via an electronic data interchange. Moreover, Tarter focuses on identifying a payor and an obligor associated with an account receivable, and then evaluating the creditworthiness status of the payor and obligor. In other words, in Tarter, the payor and obligor associated with the account receivable – and not the service provider -- is the focus of the creditworthiness evaluation. Whereas, in the present invention, the customer requests a cash advance and the method includes evaluating the current customer collateral information, evaluating a current credit status of the customer including an analysis of at least one of the customer's business performance, dilution, and advance rate, and determining to at least one of approve the customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information.

The Office Action also states at page 8, that Highbloom and Hogan “fail to disclose dilution, reviewing advance rate, and reviewing fraud possibilities.” Applicants respectfully submit that Tarter does not describe or teach evaluating a current credit status of the customer including an analysis of at least one of the customer's business performance, dilution, and advance rate. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Highbloom in view of Hogan and Tarter.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 1 be withdrawn.

Claims 2-4 depend, directly or indirectly, from independent Claim 1 which is submitted to be in condition for allowance. When the recitations of Claims 2-4 are considered in combination with the recitations of Claim 1, Applicants respectfully submit that dependent Claims 2-4 are also patentable over Highbloom in view of Hogan and Tarter.

Claim 12 recites a system for processing cash advance requests by a business entity that includes a data repository, and a process management and workflow system for the



business entity connected to an accounting system of a customer by a communication link and coupled to the data repository, wherein the process management and workflow system is configured to “receive a financial report from the accounting system via an electronic data interchange, the financial report includes current collateral information of the customer including information relating to the customer’s accounts receivable, accounts payable, and inventory...convert the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the report such that the financial report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report...extract current collateral information from the converted financial report...store said current collateral information in said data repository...receive from the customer a cash advance request...record the cash advance request...evaluate said current, customer collateral information...evaluate current credit status of the customer including an analysis of at least one of the customer’s business performance, dilution, and advance rate...determine to at least one of approve the customer’s cash advance request, deny the customer’s cash advance request, and initiate a manual review of the customer collateral information.”

None of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a system for processing cash advance requests as recited in Claim 12. More specifically, none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a system for processing cash advance requests that includes a process management and workflow system that is configured to receive a financial report including current collateral information of the customer from an accounting system, and convert the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the report such that the financial report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report such that the current collateral information can be extracted from the converted financial report.

Moreover, none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a system for processing cash advance requests that includes a process management and workflow system that is configured to evaluate current credit status of the customer including an analysis of at least one of the customer's business performance, dilution, and advance rate, and determine to at least one of approve the customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information.

Rather, Highbloom describes a computer system for monitoring the status of individual items of personal property which serve as collateral for securing financing; Hogan describes a system that charges a difference between a credit card payment received and a credit card installment loan amount due against a cardholders credit line as a cash advance; and Tarter describes a system that purchases accounts receivables from health care providers such as pharmacies and then uses the purchased accounts receivables as collateral for financial instruments.

Applicants respectfully traverse the suggestion in the Office Action at page 4 that Highbloom describes "receiving via an electronic data interchange a financial report from a received document format to a predetermined document format by detecting a report type and then by performing a mapping and translation process, extracting at least one of accounts receivable data, accounts payable data, and quality control system and loading the extracted data into the data repository." Rather, Applicants submit that Highbloom describes printing and scanning information contained in reports into a financing source computer, or inputting information into the financing source computer via a keyboard or floppy disk. Highbloom does not describe or teach a process management and workflow system configured to receive a financial report from the accounting system via an electronic data interchange, and convert the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the report such that the financial report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report. Accordingly, Applicants submit that Claim 12 is patentable over Highbloom in view of Hogan and Tarter.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 12 be withdrawn.

Claims 13-15 depend, directly or indirectly, from independent Claim 12 which is submitted to be in condition for allowance. When the recitations of Claims 13-15 are considered in combination with the recitations of Claim 12, Applicants respectfully submit that dependent Claims 13-15 are also patentable over Highbloom in view of Hogan and Tarter.

Claim 23 recites a method for processing cash advance requests using a process management and workflow system coupled to a data repository, wherein the process management and workflow system is connected to an accounting system by a communications link, wherein the method includes “receiving, from a customer, at the process management and workflow system, collateral information including information relating to the customer’s accounts receivable, accounts payable, and inventory...storing the collateral information in the data repository...receiving from the customer a cash advance request at the process management and workflow system...operating the process management and workflow system to record the cash advance request...updating the collateral information of the customer by...receiving via an electronic data interchange a financial report from the accounting system of the customer wherein the financial report includes current collateral information of the customer...converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report...extracting at least one of accounts receivable data, accounts payable data, and inventory data from the converted financial report...correcting data extraction errors using a quality control system...and loading the extracted data into the data repository...evaluating the current, customer collateral information through the process management and workflow system...evaluating a current credit status of the customer through the process management and workflow system including an analysis of at least one of the customer’s business performance, dilution, and advance

rate...and determining, through the process management and workflow system, to at least one of approve the customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information."

None of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a method for processing cash advance requests as recited in Claim 23. More specifically, none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a method for processing cash advance requests that includes updating the collateral information of the customer by receiving via an electronic data interchange a financial report from the accounting system of the customer, and converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report.

Furthermore, none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest evaluating the current, customer collateral information through the process management and workflow system, evaluating a current credit status of the customer through the process management and workflow system, and determining through the process management and workflow system to at least one of approve the customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information.

Rather, in contrast to the present invention, Highbloom describes a system for monitoring the status of individual items of personal property which serve as collateral for securing financing; Hogan describes a financial transaction card payment system, such as a credit card payment system having an installment loan feature; and Tarter describes a system that purchases accounts receivables from health care providers such as pharmacies and then uses the purchased accounts receivables as collateral for financial instruments.

Applicants respectfully traverse the suggestion in the Office Action at page 4 that Highbloom describes "updating the collateral information of the customer by receiving via an

electronic data interchange a financial report from a received document format to a predetermined document format by detecting a report type and then by performing a mapping and translation process, extracting at least one of accounts receivable data, accounts payable data, and quality control system and loading the extracted data into the data repository.” Rather, Highbloom at col. 8, lines 1+ describes printing and scanning information contained in reports into a financing source computer, or inputting the information into the financing source computer via a keyboard or floppy disk. Highbloom does not describe or teach updating the collateral information of the customer by receiving via an electronic data interchange a financial report from the accounting system of the customer, and converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report such that the data can be extracted from the converted financial report. Accordingly, Applicants submit that Claim 23 is patentable over Highbloom in view of Hogan and Tarter.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 23 be withdrawn.

Claim 24 recites a system for processing cash advance requests that includes a data repository, and a process management and workflow system coupled to the data repository, wherein the process management and workflow system is configured to “receive from a customer collateral information including information relating to the customer’s accounts receivable, accounts payable, and inventory...store said collateral information in said data repository...receive from said customer a cash advance request...record the cash advance request...update said collateral information of said customer by...receiving via an electronic data interchange a financial report from the accounting system of said customer wherein the financial report includes current collateral information of said customer...converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a

location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report...extracting at least one of accounts receivable data, accounts payable data, and inventory data from the converted financial report...correcting data extraction errors using a quality control system, and loading the extracted data into the data repository...evaluate said current, customer collateral information...evaluate current credit status of said customer including an analysis of at least one of said customer's business performance, dilution, and advance rate...and determine to at least one of approve said customer's cash advance request, deny said customer's cash advance request, and initiate a manual review of said customer collateral information."

None of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a system as recited in Claim 24. More specifically, none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a system that includes a process management and workflow system configured to update collateral information of the customer by receiving via an electronic data interchange a financial report from an accounting system of the customer, and converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report such that data can be extracted from the converted financial report.

Furthermore, none of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest a process management and workflow system configured to evaluate the current, customer collateral information, evaluate current credit status of the customer including an analysis of at least one of the customer's business performance, dilution, and advance rate, and determine to at least one of approve the customer's cash advance request, deny the customer's cash advance request, and initiate a manual review of the customer collateral information.

Rather, in contrast to the present invention, Highbloom describes a system for monitoring the status of individual items of personal property which serve as collateral for securing financing; Hogan describes a financial transaction card payment system, such as a credit card payment system having an installment loan feature; and Tarter describes a system that purchases accounts receivables from health care providers such as pharmacies and then uses the purchased accounts receivables as collateral for financial instruments. Accordingly, Applicants submit that Claim 24 is patentable over Highbloom in view of Hogan and Tarter.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 24 be withdrawn.

Notwithstanding the above, the rejection of Claims 1-4, 12-15, and 23-24 under 35 U.S.C. § 103(a) as being unpatentable over Highbloom in view of Hogan and Tarter is further traversed on the grounds that the Section 103 rejection of the presently pending claims is not a proper rejection. Obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Highbloom using the teachings of Hogan and Tarter. More specifically, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. It is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991).

In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

None of Highbloom, Hogan, or Tarter, considered alone or in combination, describe or suggest the claimed combination. Rather, the present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Highbloom teaches a system for monitoring the status of individual items of personal property which serve as collateral for securing financing; Hogan teaches a financial transaction card payment system, such as a credit card payment system having an installment loan feature; and Tarter teaches a system that purchases accounts receivables from health care providers such as pharmacies and then uses the purchased accounts receivables as collateral for financial instruments. Since there is no teaching nor suggestion for the combination of Highbloom, Hogan, and Tarter, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection of Claims 1-4, 12-15, and 23-24 be withdrawn.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1-4, 12-15, and 23-24 be withdrawn.

The rejection of Claims 5-11 and 16-22 under 35 U.S.C. § 103(a) as being unpatentable over Highbloom (U.S. Patent 5,323,315) as modified by Hogan (U.S. Pat. App. Pub. No. 2001/0013545 A1) and Tarter et al. (U.S. Patent No. 5,550,734) (“Tarter”) in further view of DeFrancesco et al. (U.S. Pat. No. 5,878,403) (“DeFrancesco”) is respectfully traversed.

Highbloom, Hogan, and Tarter are described above. DeFrancesco describes a centralized credit application entry and routing system which accepts applications from automotive dealerships, and selectively forwards them to funding sources. (col. 8, lines 62-67). The system sends the application directly to the funding sources credit application processing system bypassing the need for the funding source to manually enter the application. (col. 9, lines 22-26). The system also provides for secure access to the credit application and routing system, facilitating multiple levels of security. (col. 5, lines 44-47).



Claims 5-11 depend from independent Claim 1. Claim 1 is recited hereinabove.

None of Highbloom, Hogan, Tarter, or DeFrancesco, considered alone or in combination, describe or suggest a method for processing cash advance requests that includes generating a financial report using an accounting system, receiving the financial report at the process management and workflow system from the accounting system of the customer, converting the financial report from a received document format to a predetermined document format, and extracting current collateral information from the converted financial report.

More specifically, none of Highbloom, Hogan, Tarter, or DeFrancesco, considered alone or in combination, describe or suggest converting the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the financial report such that the report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report.

Rather, in contrast to the present invention, Highbloom describes a system for monitoring the status of individual items of personal property which serve as collateral for securing financing; Hogan describes a financial transaction card payment system, such as a credit card payment system having an installment loan feature; Tarter describes a system that purchases accounts receivables from health care providers such as pharmacies and then uses the purchased accounts receivables as collateral for financial instruments; and DeFrancesco describes a centralized credit application entry and routing system which accepts applications from automotive dealerships, and selectively forwards them to funding sources. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Highbloom as modified by Hogan and Tarter, and further in view of DeFrancesco.

When the recitations of Claims 5-11 are considered in combination with the recitations of Claim 1, Applicants respectfully submit that dependent Claims 5-11 are also patentable over Highbloom as modified by Hogan and Tarter, and further in view of DeFrancesco.

Claims 16-22 depend from independent Claim 12. Claim 12 is recited hereinabove.

None of Highbloom, Hogan, Tarter, or DeFrancesco, considered alone or in combination, describe or suggest a system for processing cash advance requests that includes a process management and workflow system that is configured to receive a financial report from an accounting system, convert the financial report from a received document format to a predetermined document format, and extract current collateral information from the converted financial report.

More specifically, none of Highbloom, Hogan, Tarter, or DeFrancesco, considered alone or in combination, describe or suggest a system that includes a process management and workflow system configured to convert the financial report from a received document format to a predetermined document format by determining whether preprocessing of the financial report is needed, determining whether segmentation of the financial report is needed wherein segmentation includes identifying a location of data within the financial report and relocating data within the report such that the financial report is recognizable, performing a document recognition process, and performing a mapping and translation process on the financial report.

Rather, Highbloom describes a computer system for monitoring the status of individual items of personal property which serve as collateral for securing financing; Hogan describes a system that charges a difference between a credit card payment received and a credit card installment loan amount due against a cardholders credit line as a cash advance; Tarter et al. describes a system that purchases accounts receivables from health care providers such as pharmacies and then uses the purchased accounts receivables as collateral for financial instruments; and DeFrancesco describes a centralized credit application entry and routing system which accepts applications from automotive dealerships, and selectively forwards them to funding sources. Accordingly, Applicants respectfully submit that Claim 12 is patentable over Highbloom as modified by Hogan and Tarter, and further in view of DeFrancesco.

When the recitations of Claims 16-22 are considered in combination with the recitations of Claim 12, Applicants respectfully submit that dependent Claims 16-22 are also

patentable over Highbloom as modified by Hogan and Tarter, and further in view of DeFrancesco.

Notwithstanding the above, the rejection of Claims 5-11 and 16-22 under 35 U.S.C. § 103(a) as being unpatentable over Highbloom as modified by Hogan and Tarter, and further in view of DeFrancesco is further traversed on the grounds that the Section 103 rejection of the presently pending claims is not a proper rejection. Obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Highbloom using the teachings of Hogan, Tarter, and DeFrancesco. More specifically, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. It is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.

None of Highbloom, Hogan, Tarter, or DeFrancesco, considered alone or in combination, describe or suggest the claimed combination. Rather, the present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Since there is no teaching nor suggestion for the combination of Highbloom, Hogan, Tarter, and DeFrancesco, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection of Claims 5-11 and 16-22 be withdrawn.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 5-11 and 16-22 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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